

Appendix J

Essential Documents for the Conduct of a Clinical Trial

APPENDIX J.
ESSENTIAL DOCUMENTS FOR THE CONDUCT OF A CLINICAL TRIAL

Essential documents are those documents that individually and collectively evaluate the conduct of a trial and the quality of the data produced. These documents demonstrate the compliance of the investigator and sponsor with the standards of Good Clinical Practice (GCP) and all applicable regulatory requirements. Note: The ICH Guidelines have been adopted by the FDA as guidances, not regulations.

The Office of Human Research Protection (OHRP) and Health and Human Services (HHS) regulations (45 CFR 46) and Good Clinical Practice recommendations apply for all trials that receive funding from a Health and Human Service agency. Trials with a Food and Drug Administration (FDA) Investigational Drug Application (IND) must additionally comply with 21CFR regulations.

Document	Purpose	File	Regulation/Reference
Assurance Number	<p>The institution is responsible for obtaining and maintaining a current Health and Human Services (HHS) Assurance Number through the Office of Human Research Protection (OHRP)</p> <ul style="list-style-type: none"> ■ The PI is responsible for ensuring that a current Assurance Number is in effect while conducting research on human subjects ■ All performance sites must maintain the Assurance Number on file and obtain renewal prior to expiration 	<p>In a Regulatory Binder at the site</p> <p>A copy of the Assurance Number must be on file with the sponsor</p>	<u>45 CFR 46.103(a)</u>
Auditing Reports	<ol style="list-style-type: none"> 1. Document audit visits and findings of the auditor 2. Copies of all audit visit reports are filed at the site and sent to the sponsor 	In the Regulatory Binder at the site	ICH Guidance: E6 Good Clinical Practice: Section 5.19.3
Case Report Form	<ol style="list-style-type: none"> 1. Signed, dated, and completed Case Report Forms (CRFs): <ul style="list-style-type: none"> ■ Document that the investigator or authorized member of the investigator's staff confirms the observations recorded ■ Document all changes/additions or corrections made to CRF after initial data were recorded 2. Site retains copy 3. Originals retained by sponsor after study completion and/or site closure 	In the patient's research record at the site	21 CFR 312 ICH Guidance: E6 Good Clinical Practice: Sections 8.3.14 8.3.15
Communications	<ol style="list-style-type: none"> 1. Document all relevant communications other than site visits, for example: <ul style="list-style-type: none"> ■ Letters ■ Meeting Notes ■ Notes of Telephone Calls ■ E-Mail Messages 	In the appropriate Regulatory Binder or patient's	ICH Guidance: E6 Good Clinical Practice: Section 8.3.11

Document	Purpose	File	Regulation/Reference
Communications (continued)	<ol style="list-style-type: none"> Subject specific communications must be filed with source documents in the subject's research record Document any agreements or significant discussions regarding trial administration, protocol violations, trial conduct, adverse event (AE) reporting, etc. Save electronic media, originals, and/or certified copies 	research record at the site	
Consent Form	<ol style="list-style-type: none"> Obtain signed informed consent forms in accordance with the protocol for each prospective subject. The form must be dated prior to participation of each subject in a trial Save all versions submitted and approved by site's institutional review board (IRB) Document revisions of the trial-related documents that take effect during the trial; save any revisions to: <ul style="list-style-type: none"> Informed Consent Re-consent the participant when pertinent and retain the Informed Consent Any other written information provided to the subjects Retain consents obtained for screening purposes even if the subject was not enrolled in the study Non-English speaking subjects must be consented in a language they can understand <p>Note: Annual Review and/or changes in consent forms due to AEs and/or Safety Memos are at the directive of the site's IRB</p>	IRB approved copies in the Regulatory Binder at the site and signed consents in the participant's research record or in the Regulatory Binder at the site	45 CFR 46.111(a)(4) 21 CFR 50 21 CFR 56.111(a)(4) ICH Guidance: E6 Good Clinical Practice: Sections 8.3.12 8.2.3 8.3.2
Curriculum Vitae	<ol style="list-style-type: none"> Document the qualifications and eligibility of the investigator(s) subinvestigator(s), and other key personnel to conduct a trial and/or to provide medical supervision of subjects Available for all investigators, subinvestigators, any other person listed on Form FDA 1572 Form, and other key personnel at the site Submit updated/revised investigator(s) and subinvestigator(s) CV to the PIO 	In the Regulatory Binder at the site	ICH Guidance: E6 Good Clinical Practice: Sections 8.2.10 8.3.5

Document	Purpose	File	Regulation/Reference
FDA 1572 Form	<ol style="list-style-type: none"> Document that the Investigator of Record (IoR) agrees to conduct the trial according to the obligations stated in the form Update as study personnel and/or other data on the form changes The original version and any updated form must be retained as per regulatory requirements The Investigator in box 1 of Form FDA 1572 is the individual who must sign and date the signature box Only laboratories specified in the protocol need to be listed in Section 4 <ul style="list-style-type: none"> Research /academic labs need not be listed on Form FDA 1572, but should be listed in the protocol Clinical labs for each clinical site need not be listed in the protocol for large multicenter studies (to avoid overcrowding the protocol document). But should go on the site's Form FDA 1572 The central laboratory should be listed in the protocol for multicenter studies and on the sites' Forms FDA 1572 Section 6 must list any individual: <ul style="list-style-type: none"> Responsible for conducting/ performing study visits Authorized to prescribe study medication This may include but is not limited to the following: <ul style="list-style-type: none"> MDs Pharmacist of Record Nurse Practitioner Physician's Assistant Research Nurse If there are no individuals that need to be listed, then write "NONE" 	In the Regulatory Binder at the site	21 CFR 312
FDA Financial Disclosure Form 3455	<ol style="list-style-type: none"> Document the financial aspects of the trial and the financial agreement between the investigator/institution and the sponsor for the trial Certification or disclosure statement to: <ul style="list-style-type: none"> Certify that there is no financial interest or Disclose specific financial interests of Investigators and subinvestigators listed on Form FDA 1572, as well as their spouses and dependent children Local institution/IRB and/or Group SOPs may have additional requirements 	In a secure area in a sealed envelope at the site	ICH Guidance: E6 Good Clinical Practice: Section 8.2.4 21 CFR 54

Document	Purpose	File	Regulation/Reference
Final Closeout Monitoring Report	<p>Final report by investigator is sent to the IRB where required and, where applicable, to the regulatory authorities, to document completion of the trial. Included is the following information:</p> <ul style="list-style-type: none"> ■ Disposition of the subjects ■ Location of the research records ■ Disposition of the specimens ■ Disposition of the study drugs ■ Other information as required by the institution or local IRB (e.g., number of patients screened, number enrolled, serious adverse experiences) 	In the Regulatory Binder at the site	ICH Guidance: E6 Good Clinical Practice: Sections 4.13 8.4.5 8.4.7
Investigational Drug Brochures (IDBs) and Safety Package Inserts	<ol style="list-style-type: none"> 1. Document that relevant and current scientific information about the investigational product has been provided to the investigator 2. Include updates to document that investigator is informed in a timely manner of relevant information as it becomes available 3. Keep a copy on file for EACH study medication used within the protocol 4. Include the following: <ul style="list-style-type: none"> ■ The most recent version ■ Addendum to IDBs ■ Safety letters 5. Some IDBs must be shredded per protocol/sponsor. Some studies require that a historical trail of IDBs and their individual IRB letters of acknowledgement be retained 	In the Regulatory Binder at the site and in the pharmacy	ICH Guidance: E6 Good Clinical Practice: Sections 8.2.1 8.3.1
Investigational Product/Study Drug Accountability	<ol style="list-style-type: none"> 1. The Pharmacist of Record must keep records to account for the disposition of investigational products/study drugs by documenting the following: <ul style="list-style-type: none"> ■ Shipment dates ■ Batch number 2. Document tracking of: <ul style="list-style-type: none"> ■ Product batch ■ Review of shipping conditions ■ Accountability 3. Document that the investigational products have been used according to the protocol 4. Document the final accounting of investigational products: <ul style="list-style-type: none"> ■ Received at the site ■ Dispensed to subjects ■ Returned by the subjects ■ Returned to the sponsor ■ Destroyed by the site 	In the pharmacy records at the site	ICH Guidance: E6 Good Clinical Practice: Sections 8.2.15 8.3.8 8.3.23 8.4.1

Document	Purpose	File	Regulation/Reference
IRB Correspondence	<ol style="list-style-type: none"> 1. Copies of all materials submitted to the IRB with dated proof of submission and IRB approval (when appropriate) for the following: <ul style="list-style-type: none"> ■ Advertisements: document that recruitment measures are appropriate and not coercive ■ All versions of consent forms ■ All protocols and amendments ■ Annual reports to the IRB ■ IND safety reports/Adverse Event Report ■ Initial protocol submission ■ Investigational drug brochure or safety package inserts ■ Protocol specific education material ■ Subject compensation ■ Any other documents receiving IRB approval or their favorable opinion ■ Any other written information to be provided to subjects will be given appropriate written information (content and wording) to support their ability to give fully informed consent ■ Any other pertinent communications with the IRB 	In the Regulatory Binder at the site	45 CFR 46 21 CFR 50 21 CFR 56 ICH Guidance: E6 Good Clinical Practice: Sections 3.1.4 4.10 5.17.3 8.2.3 8.2.7 8.3.2 8.3.3 8.3.19
IRB Membership List	<ol style="list-style-type: none"> 1. Document that composition of IRB/independent ethics committee (IEC) is in agreement with Good Clinical Practice (GCP) 2. Update when members change and as required by local institution/IRB policy 3. A letter stating that the IRB does not release a list of names of their committee is acceptable as long as the letter is dated, contains the FWA number, states how often the roster is updated, states that no investigator participating on the protocol votes or engages in any deliberations regarding the protocol, and is signed by the IRB chairman 4. Investigator needs current IRB composition on files: <ul style="list-style-type: none"> ■ Titles ■ Affiliation ■ Names are not necessary 	In the Regulatory Binder at the site	45 CFR 46 21 CFR 50 21 CFR 56 ICH Guidance: E6 Good Clinical Practice: Section 8.2.8

Document	Purpose	File	Regulation/Reference
Laboratory	<ol style="list-style-type: none"> Document competence of facility to perform required tests, and support reliability of results of medical/laboratory/technical procedures/tests: <ul style="list-style-type: none"> ■ Certification or Accreditation ■ If a research/academic lab does not have certification or accreditation, a “Note-to-File” documenting that the lab does not hold certification or accreditation is required ■ Update when certifications expire or laboratory changes to document that tests remain adequate throughout the trial period ■ Established quality control and/or external quality assessment Document normal values/ranges for medical/laboratory/technical procedures/tests included in the protocol <ul style="list-style-type: none"> ■ If a research/academic lab does not have normal values, a “Note-to-File” documenting that the lab does not have normal values Update documentation of normal values/ranges when they are revised during the trial The reference ranges and certifications must be on file for the following listings: <ul style="list-style-type: none"> ■ Local or central laboratories that analyze specimens for the study ■ Any group central laboratory 	In the Regulatory Binder at the site	ICH Guidance: E6 Good Clinical Practice: Sections 8.2.11 8.2.12 8.3.6 8.3.7
Screening and Enrollment Randomization Logs	<ol style="list-style-type: none"> Document identification of subjects who entered pretrial screening Document chronological enrollment of subjects by number Screening and enrollment/ randomization logs may be separate or combined Include the following information: <ul style="list-style-type: none"> ■ Initials of all patients screened for each study ■ PID number ■ Date screened ■ Date randomized ■ If not randomized, indicate reason 	In the screening files or protocol files at the site	ICH Guidance: E6 Good Clinical Practice: Sections 8.3.21 8.4.3
Subject Identification Code List	<ol style="list-style-type: none"> Document that the investigator keeps a confidential list of names of all subjects allocated to trial numbers upon enrolling in a trial Allows investigator/institution to permit identification of all subjects enrolled in the trial in case followup is required List needs to be kept in a confidential manner and for agreed upon time 	In the protocol file at site	ICH Guidance: E6 Good Clinical Practice: Sections 8.3.21 8.4.3
Serious Adverse Events (SAE)	<ol style="list-style-type: none"> Notification by originating investigator to sponsor of Serious Adverse Events, related reports, and other safety information Notification by sponsor to investigators of safety information 	In Regulatory File at site	45 CFR 46 21 CFR 50 21 CFR 56

Document	Purpose	File	Regulation/Reference
Serious Adverse Events (SAE) (continued)	3. Notification by sponsor and/or investigator, where applicable, to regulatory authorities and IRB of unexpected serious adverse drug reactions and of other safety information		21 CFR 312 ICH Guidance: E6 Good Clinical Practice: Sections 4.11 5.16.2 5.17 8.3.16 8.3.17 8.3.18
Delegation of Responsibilities/ Activities Form	<ol style="list-style-type: none"> 1. This form includes a list of individuals who are delegated study-related tasks (ICH GCP 4.1.5). The form must contain the signatures and initials of all study personnel, including those making entries or corrections on the case report forms, (ICH GCP 8.3.24) as well as all ancillary study personnel (e.g., laboratory personnel, data personnel, and pharmacy personnel) 2. The list must be kept current 3. The form may be tailored by each site to accurately reflect the designated tasks at each institution 4. Document signatures and initials of all persons authorized to make entries and/or corrections on CRFs. Include all site staff working on a study, such as: <ul style="list-style-type: none"> ■ Clinicians ■ Physicians ■ Pharmacists ■ Data Personnel 5. Include on the log: <ul style="list-style-type: none"> ■ Initials ■ Legal signature, including first and last name ■ Printed signature ■ Responsibilities ■ Start Date ■ Credentials (if appropriate) 	In the Regulatory File at the site	ICH Guidance: E6 Good Clinical Practice: Section 8.3.24 ICH Guidance: 4.1.5
Source Documents	<ol style="list-style-type: none"> 1. Document the existence of the subject and substantiate integrity of trial data collected 2. Original documents and/or certified copies of documents related to the trial, medical treatment, and history of the subject 3. Must be signed and dated 	As per requirements of local institutions	21 CFR 11 21 CFR 312 ICH Guidance: E6 Good Clinical Practice: Section 8.3.13

Document	Purpose	File	Regulation/Reference
Unblinding	<ol style="list-style-type: none"> 1. Decoding procedures for blinded trials to document how, in case of an emergency, identity of blinded investigational product can be revealed without breaking the blind for the remaining participant's treatments 2. Document any decoding that may have occurred at the site during the trial 	In the protocol files at the site or in the pharmacy files and in the patient record	ICH Guidance: E6 Good Clinical Practice: Sections 8.2.17 8.4.6